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Company, and Disney Enterprises, Inc.  
8

9 UNITED STATES DISTRICT COURT  
10 CENTRAL DISTRICT OF CALIFORNIA

11 JOHN WILLIAM KAIPO ENOS, an  
individual and JOHNSON  
12 ENTERTAINMENT, LLC, a Native  
Hawaii limited liability company,

13 Plaintiffs,

14 v.

15 THE WALT DISNEY COMPANY, a  
16 Delaware corporation; DISNEY  
ENTERPRISES, INC., a Delaware  
17 corporation; and DOES 1-10, inclusive,

18 Defendants.  
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CASE NO. 2:23-cv-05790-DSF-AGR<sub>x</sub>

Hon. Dale S. Fischer

**DECLARATION OF BRADLEY J.  
MULLINS IN SUPPORT OF  
DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT**

Date: April 7, 2025  
Time: 1:30 p.m.  
Courtroom: 7D (First Street Courthouse)

Complaint filed: July 18, 2023  
FAC Filed: November 22, 2023  
Trial Date: July 29, 2025

**DECLARATION OF BRADLEY MULLINS**

I, Bradley Mullins, the undersigned, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California and before this Court. I am, through my professional corporation, a partner at the law firm of Mitchell Silberberg & Knupp LLP, counsel for Defendants The Walt Disney Company and Disney Enterprises, Inc. (collectively, “Defendants” or “Disney”) in this action. The facts stated in this declaration are within my personal knowledge, and if called upon as a witness, I could and would testify competently to them.

2. Attached hereto as **Exhibit 1** are excerpts from a true and correct copy of the Transcript of Deposition of Plaintiff John William Kaipo Enos and Johnson Entertainment, LLC, Volume I, dated August 21, 2024.

3. Attached hereto as **Exhibit 2** are excerpts from a true and correct copy of the Transcript of Deposition of Plaintiff John William Kaipo Enos and Johnson Entertainment, LLC, Volume II, dated August 22, 2024.

4. Attached hereto as **Exhibit 3** are excerpts from a true and correct copy of the Transcript of Deposition of Plaintiff John William Kaipo Enos and Johnson Entertainment, LLC, Volume III, dated October 1, 2024.

5. Attached hereto as **Exhibit 4** is a true and correct copy of the document marked as Exhibit 1 during the Deposition of Plaintiff John William Kaipo Enos and Johnson Entertainment, LLC.

6. Attached hereto as **Exhibit 5** is a true and correct copy of the document marked as Exhibit 3 during the Deposition of Plaintiff John William Kaipo Enos and Johnson Entertainment, LLC.

7. Attached hereto as **Exhibit 6** is a true and correct copy of the document marked as Exhibit 4 during the Deposition of Plaintiff John William Kaipo Enos and Johnson Entertainment, LLC.

1           8.     Attached hereto as **Exhibit 7** is a true and correct copy of the  
2 document marked as Exhibit 7 during the Deposition of Plaintiff John William  
3 Kaipo Enos and Johnson Entertainment, LLC.

4           9.     Attached hereto as **Exhibit 8** is a true and correct copy of the  
5 document marked as Exhibit 10 during the Deposition of Plaintiff John William  
6 Kaipo Enos and Johnson Entertainment, LLC.

7           10.    Attached hereto as **Exhibit 9** is a true and correct copy of the  
8 document marked as Exhibit 12 during the Deposition of Plaintiff John William  
9 Kaipo Enos and Johnson Entertainment, LLC.

10          11.    Attached hereto as **Exhibit 10** is a true and correct copy of the  
11 document marked as Exhibit 11 during the Deposition of Plaintiff John William  
12 Kaipo Enos and Johnson Entertainment, LLC.

13          12.    Attached hereto as **Exhibit 11** is a true and correct copy of the  
14 document marked as Exhibit 16 during the Deposition of Plaintiff John Williams  
15 Kaipo Enos and Johnson Entertainment, LLC.

16          13.    Attached hereto as **Exhibit 12** is a true and correct copy of the  
17 document marked as Exhibit 18 during the Deposition of Plaintiff John William  
18 Kaipo Enos and Johnson Entertainment, LLC.

19          14.    Attached hereto as **Exhibit 13** is a true and correct copy of the  
20 document marked as Exhibit 19 during the Deposition of Plaintiff John William  
21 Kaipo Enos and Johnson Entertainment, LLC.

22          15.    Attached hereto as **Exhibit 14** is a true and correct copy of the  
23 document marked as Exhibit 20 during the Deposition of Plaintiff John William  
24 Kaipo Enos and Johnson Entertainment, LLC.

25          16.    Attached hereto as **Exhibit 15** is a true and correct copy of the  
26 document marked as Exhibit 21 during the Deposition of Plaintiff John William  
27 Kaipo Enos and Johnson Entertainment, LLC.

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1           17. Attached hereto as **Exhibit 16** is a true and correct copy of the  
2 document marked as Exhibit 22 during the Deposition of Plaintiff John William  
3 Kaipo Enos and Johnson Entertainment, LLC.

4           18. Attached hereto as **Exhibit 17** is a true and correct copy of the  
5 document marked as Exhibit 23 during the Deposition of Plaintiff John William  
6 Kaipo Enos and Johnson Entertainment, LLC.

7           19. Attached hereto as **Exhibit 18** is a true and correct copy of the  
8 document marked as Exhibit 24 during the Deposition of Plaintiff John William  
9 Kaipo Enos and Johnson Entertainment, LLC.

10          20. Attached hereto as **Exhibit 19** is a true and correct copy of the  
11 document marked as Exhibit 25 during the Deposition of Plaintiff John William  
12 Kaipo Enos and Johnson Entertainment, LLC.

13          21. Attached hereto as **Exhibit 20** is a true and correct copy of the  
14 document marked as Exhibit 26 during the Deposition of Plaintiff John William  
15 Kaipo Enos and Johnson Entertainment, LLC.

16          22. Attached hereto as **Exhibit 21** is a true and correct copy of the  
17 document marked as Exhibit 27 during the Deposition of Plaintiff John William  
18 Kaipo Enos and Johnson Entertainment, LLC.

19          23. Attached hereto as **Exhibit 22** is a true and correct copy of the  
20 document marked as Exhibit 71 during the Deposition of Plaintiff John William  
21 Kaipo Enos and Johnson Entertainment, LLC.

22          24. Attached hereto as **Exhibit 23** is a true and correct copy of the  
23 document marked as Exhibit 66 during the Deposition of Plaintiff John William  
24 Kaipo Enos and Johnson Entertainment, LLC.

25          25. Attached hereto as **Exhibit 24** is a true and correct copy of the Report  
26 by Jon Weiman, marked as Exhibit 7 during the Deposition of Jon Weiman.

27          26. Attached hereto as **Exhibit 25** are excerpts from a true and correct  
28 copy of the Transcript of Deposition of Jon Weiman, dated January 28, 2025.

1           27. Attached hereto as **Exhibit 26** is a true and correct copy of a  
2 document produced by Plaintiffs in this action, Bates Nos. PL00147.

3           28. Attached hereto as **Exhibit 27** is a true and correct copy of a  
4 document produced by Plaintiffs in this action, Bates No. PL00148.

5           29. Attached hereto as **Exhibit 28** is a true and correct copy of two  
6 documents produced by Plaintiffs in this action, Bates Nos. PLF00222.

7           30. Attached hereto as **Exhibit 29** is a true and correct copy of the First  
8 Amended Complaint for Damages and Injunctive Relief in this action, dated  
9 November 22, 2023 (Dkt. No. 18).

10           31. Attached hereto as **Exhibit 30** is a true and correct copy of Plaintiffs'  
11 Initial Disclosures dated April 5, 2024.

12           32. Attached hereto as **Exhibit 31** is a true and correct copy of relevant  
13 excerpts from Plaintiff John Williams Kaipo Enos' Responses to Defendant The  
14 Walt Disney Company's First Set of Interrogatories dated July 2, 2024.

15           33. Attached hereto as **Exhibit 32** is a true and correct copy of relevant  
16 excerpts from Plaintiff John Williams Kaipo Enos' Responses to Defendant The  
17 Walt Disney Company's First Set of Interrogatories dated August 15, 2024.

18           34. Attached hereto as **Exhibit 33** is a true and correct copy of a screen  
19 capture taken at my direction from the Wayback Machine, reflecting a July 20,  
20 2018 blog post located at [disneyparks.disney.co/blog/2018/07/%CA%BBolu-](https://disneyparks.disney.co/blog/2018/07/%CA%BBoluduffys-newest-friend-makes-your-heart-sing-at-aulani-a-disney-resort-spa)  
21 [duffys-newest-friend-makes-your-heart-sing-at-aulani-a-disney-resort-spa](https://disneyparks.disney.co/blog/2018/07/%CA%BBoluduffys-newest-friend-makes-your-heart-sing-at-aulani-a-disney-resort-spa). This  
22 screen capture was produced as TWDC-OLU-001371-74.

23           35. Attached hereto as **Exhibit 34** is a true and correct copy of a screen  
24 capture taken at my direction of an Instagram post dated July 20, 2018, from the  
25 Instagram account @disneyaulani. This screen capture was produced as TWDC-  
26 OLU-001377-79.

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1           36. Attached hereto as **Exhibit 35** is a true and correct copy of a screen  
2 capture taken at my direction of the webpage located at  
3 [sites.disney.com/waltdisneyimagineering/duffys-friends/](https://sites.disney.com/waltdisneyimagineering/duffys-friends/)

4           37. Attached hereto as **Exhibit 36** is a true and correct copy of a screen  
5 capture taken at my direction from the webpage located at  
6 <http://www.honubymythesea.com/meet-the-cast/>

7           38. Attached hereto as **Exhibit 37** is a true and correct copy of the  
8 trademark registration for the design mark "HONU BY THE SEA," Reg. No.  
9 4,780,179.

10          39. Attached hereto as **Exhibit 38** is a true and correct copy of the  
11 trademark registration for the word mark "Mele Series," Reg. No. 6,364,904


12          40. Attached hereto as **Exhibit 39** are true and correct copies of the  
13 trademark registrations for "HAWAII IS MY HOME," Reg. Nos. 6,679,884 and  
14 6,007,288.

15          41. Attached hereto as the **Appendix** is a visual timeline of key dates  
16 discussed in Defendants' Motion for Summary Judgment.

17          42. I met and conferred with Plaintiffs' counsel regarding this Motion for  
18 Summary Judgment on February 10, 2024.

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21          I declare under penalty of perjury under the laws of the United States of  
22 America that the foregoing is true and correct.

23          I executed this declaration on February 14, 2025 in West Hollywood,  
24 California.

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28 Bradley J. Mullins